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Attorneys for Defendant  
STONEBRIDGE LIFE INSURANCE  
COMPANY, A VERMONT CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JESSICA LEE, individually and on behalf of a  
class of similarly situated individuals,

Plaintiff,

v.

STONEBRIDGE LIFE INSURANCE  
COMPANY, a Vermont corporation and  
TRIFECTA MARKETING GROUP LLC, a  
Florida limited liability company,

Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND  
~~PROPOSED~~ ORDER TO  
EXTEND DEADLINE TO  
COMPLETE SETTLEMENT  
CONFERENCE**

1 Plaintiff Jessica Lee and defendant Stonebridge Life Insurance Company (“Stonebridge”),  
2 through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, plaintiff filed the complaint in this case on January 4, 2011;

4 WHEREAS, Stonebridge filed its answer and affirmative defenses to the complaint on  
5 March 28, 2011;

6 WHEREAS, pursuant to the Court’s Case Management Scheduling Order, dated April 21,  
7 2011, the Court set a deadline of August 19, 2011 to complete a Settlement Conference before  
8 Magistrate Judge Spero;

9 WHEREAS, on July 28, 2011, Plaintiff filed an amended complaint, adding defendant  
10 Trifecta Marketing Group LLC (“Trifecta”);

11 WHEREAS, Trifecta has not yet appeared in this case or responded to the amended  
12 complaint;

13 WHEREAS, Stonebridge’s deadline to respond to the amended complaint is currently  
14 September 26, 2011;

15 WHEREAS, Trifecta’s participation in the Settlement Conference and/or pending  
16 discovery will likely impact the potential for a settlement in this case;

17 WHEREAS, the parties believe that a Settlement Conference would not be productive at  
18 this time;

19 WHEREAS, Plaintiff’s counsel understands that Magistrate Judge Spero is available to  
20 conduct a Settlement Conference in this matter in early December;

21 THEREFORE, the parties hereby jointly request that the Court extend the deadline to  
22 complete the Settlement Conference to December 16, 2011.

1 Dated: August 19, 2011

DAN MARMALEFSKY  
TIFFANY CHEUNG  
MORRISON & FOERSTER LLP

2  
3  
4 By: /s/ Tiffany Cheung

Tiffany Cheung

5 Attorneys for Defendant Stonebridge  
6 Life Insurance Company

7 Dated: August 19, 2011

SEAN REIS  
EDELSON MCGUIRE, LLP

8  
9 By: /s/ John Ochoa

10 John Ochoa

11 Attorneys for Plaintiff Jessica Lee

12 **ECF ATTESTATION**

13 I, Tiffany Cheung, am the ECF User whose ID and Password are being used to file this:

14 **STIPULATION TO EXTEND DEADLINE TO COMPLETE SETTLEMENT**  
15 **CONFERENCE**

16 In compliance with General Order 45, X.B., I hereby attest that John Ochoa concurred in  
17 this filing.

18 Dated: August 19, 2011

MORRISON & FOERSTER LLP

19  
20 By: /s/ Tiffany Cheung

21 Tiffany Cheung

22  
23  
24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 DATED: 8/22/11

26 By: 

The Honorable Richard Seeborg